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USWEST

Elridge A. Stafford
Director-Federal Relations

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FILE

October 1, 1992

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ms. Donna R. Searcy
Secretary
Federal Communications Commission
1919 M Street, N.W., Suite 222
Stop Code 1170
Washington, D.C. 20036

RE: The Use of N11 Codes and Other Abbreviated Dialing
Arrangements, CC Docket No. 92-105

Dear Ms. Searcy:

Please place this letter and attachments in the record for the above mentioned docket. The attachments to this letter are: 1) a request from U S WEST Communications (USWC) to the North American Numbering Plan Administration (NANPA) dated September 5, 1992 to provide a position and recommendation on the expanded use and assignment of the 555 central office code nationwide, 2) the reply of the NANPA to USWC dated September 25, 1992, describing action items and initiatives to evaluate the USWC request. The issues discussed in the attached correspondences are directly related to the proceeding on the use of N11 codes and other abbreviated dialing arrangements, CC Docket 92-105.

Should you have any questions regarding this letter, please contact me. Acknowledgement and date of receipt of this letter are requested. A duplicate copy is attached for this purpose.

Sincerely,

Elridge A. Stafford

Attachments

cc: Mr. Peyton Wynns

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U S WEST Communications
Sixteen Hundred Bell Plaza
Seattle, Washington 98101

USWEST
COMMUNICATIONS 

September 3, 1992

Mr. R. R. Conners
NANP Administration
290 W. Mt. Pleasant Ave.
Room 1B234
Livingston, NJ 07039

Dear Mr. Conners,

This is to request the NANP Administration provide a position and recommendation on the expanded use and assignment of the 555 Central Office Code nationwide.

As you know, U S WEST has proposed the use of the 555-XXXX resource as an alternative NANP-wide abbreviated dialing arrangement for information service providers (ISPs). We believe this resource has the potential of accommodating as many as 10,000 ISPs and, as such, may be a superior alternative to the use of a more limited resource, such as N11 codes.

U S WEST Communications has received a customer request for the assignment and use of a 555-XXXX number for the purpose of providing information services. It is our understanding that the 555 Central Office Code is used to provide public access to Directory Assistance Service. In addition, the majority of the 555 Central Office Code is available for use nationally, as only specific 555 numbers (e.g. 555-1212) within the code are used for Directory Assistance Service. While we believe U S WEST may have the authority to assign a 555-XXXX number for local use, we are reluctant to do so, since local arrangements of 555-XXXX numbers would serve to preclude future national arrangements. This issue is of particular importance since it appears the 555-XXXX number may be the last series of seven-digit telephone numbers that could potentially be used on a NANP-wide basis.

Our customer is interested in establishing service, using a 555-XXXX numbering resource, as quickly as possible. To this end, we require a response from you, addressing the NANP Administration position and recommendation on the assignment and use of a 555-XXXX resource to our customer, by September 23, 1992. We are particularly interested in your views on our proposal to make 555-XXXX numbers available NANP-wide, and whether local arrangements should be abeyanced until the industry has had an opportunity to discuss the relative advantages of NANP-wide use versus local arrangements of the resource.

If you have any questions regarding this request, please do not hesitate to contact me on 206-346-7775. Thank you in advance for your prompt attention to this request.

Sincerely,

Gaye A. Murdock

G. A. Murdock
Manager - Strategic Numbering Planning

cc: A. Gaechter
M. S. Bumgarner

Bellcore

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Ronald R. Conners
Director NANP Administration

ICC 18-233
290 West Mt. Pleasant Avenue
Livingston, New Jersey 07039
201-740-4645

September 25, 1992

Gayle A. Murdock
U S WEST Communications
Sixteen Hundred Bell Plaza
Seattle, Washington 98191

Dear Gayle,

This is in response to your letter of September 3 in which you ask for a NANPA position and recommendation on the expanded nationwide use and assignment of line numbers within the 555 central office code.

Your letter expresses the view that the nearly 10,000 line numbers available for use within the 555 central office code may provide a superior alternative to the handful of N11 codes that could be made available to information service providers and other providers of services that may benefit from nationwide single number access. We share that view. We believe that the remaining N11 codes, at least for NANP-wide assignment, should be reserved for applications in the public interest. Current 911 service provides a good example of such an application.

Your letter also points out that line numbers in the 555 central office code represent perhaps the last opportunity for NANP-wide seven-digit telephone numbers, and suggests that due consideration be given to that possibility. Again, we concur. It seems reasonable that many service providers would benefit from an NANP-wide, or at least a national, assignment. Reserving some, but not necessarily all, of the 555 line numbers for NANP-wide or national assignment could meet this need. Such an arrangement would require central administration of the 555 line number assignments.

We recommend that steps be taken immediately to begin dialogue on this issue within the industry. As administrators of the NANP, we believe that it would be appropriate for us to take the initiative in making that happen.

- The industry should be informed that NANPA intends to begin discussion on the use of 555 line numbers for single number access to services such as those provided by information service providers. It is our intention to raise this as a new issue at the next ICCF meeting in November.

- A survey should be taken to determine what 555 line numbers are currently in use and for what services they are used.
- Local exchange carriers have always administered line numbers, including those within the 555 code. Their willingness to participate in this effort must be determined.
- Information service providers should be consulted to determine if 555 line numbers can meet their requirements. ILC issue #036 addresses this issue. NANPA is represented on that the task group working that issue.
- The FCC (and, of course, the DOC in Canada) should be notified that the industry is exploring the issue.
- If the results of the steps outlined above are satisfactory, assignment guidelines must be prepared for the 555 line numbers. Traditionally, this has been done by an ICCF working group.
- If the decision is to reserve a subset of 555 line numbers for NANP-wide or national assignment, an administrator is needed. NANPA would be willing to assume this role.

Your letter indicates that U S WEST has a potential customer for a 555 line number. Although U S WEST will make its own decision on whether or not to make such an assignment, we would suggest that the industry might best be served if no further assignments of 555 line numbers were made, at least until the industry has had an opportunity to review and comment on the issue.

If you have any questions, please feel free to call me.

Sincerely,



for Ron Connors